



BellSouth Telecommunications, Inc.

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April 29, 2002

REC'D TN
REGULATORY AUTH.
Guy M. Hicks
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OFFICE OF THE
EXECUTIVE SECRETARY

VIA HAND DELIVERY

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: *Docket to Establish Generic Performance Measurements, Benchmarks and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

Dear Mr. Waddell:

On April 16, 2002, during its oral deliberations in this proceeding, the Authority stated that parties should submit:

- (1) Business rules for the adopted measurement, percent of timely loop modification/de-conditioning on xDSL Loops within 10 days of deliberation on this issue.
- (2) Language within the business rules clarifying the "statistically valid" sampling techniques that are acceptable for the adopted measurement, service order accuracy, within 10 days of deliberation on this issue.

Attached is the requested business rule language. In making this filing, BellSouth is not waiving its right to challenge any aspect of the Authority's forthcoming written order.

While the TRA did not request comments from the parties with respect to these matters, the "CLEC Coalition" has filed explanatory comments along with its proposed business rules. BellSouth respectfully requests that it be provided the opportunity to file explanatory comments in support of its language and notes that, in the past, the Authority has both stricken and not allowed BellSouth to file comments explaining proposed best and final contract language. Alternatively, BellSouth requests that the CLEC Coalition's comments be stricken.

Very truly yours,


Guy M. Hicks

GMH/jej

444617

POSTED
4/29/02

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Docket to Establish Generic Performance Measurements, Benchmarks and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*

Docket No. 01-00193

Business Rules:

Percent of Timely Loop Modification/Conditioning is the percentage of xDSL/Line Sharing orders completing the modification/conditioning within the established interval. The actual completion interval is the elapsed time from when BellSouth issues a SOCS date time stamp for an order for xDSL or Line Sharing from the CLEC to BellSouth's actual completion of the loop modification/conditioning date. The clock starts when a valid order number is assigned by SOCS and stops when the technician completes the loop modification/conditioning. Elapsed time for each order is accumulated for each reporting dimension.

To Be Added to Existing Business Rules:

Service Order Accuracy Sampling Process:

A stratified Random Sampling for Proportions technique is used to provide a statistically valid sample from each of the Product Disaggregations. A list of all orders completed in the report month is generated. The orders are then listed by the disaggregations specified in the SQM. For each disaggregation, the quantity of completed orders and the error rate for each disaggregation from previous months are used as the basis for scenario testing to determine the number of orders that are to be reviewed to achieve a confidence interval of $\pm 5\%$ for each disaggregation. Once the sample size for each desagregation is determined, the specified quantity of orders for each disaggregation are pulled for review.

CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2002, a copy of the foregoing document was served on the following parties, via the method indicated:

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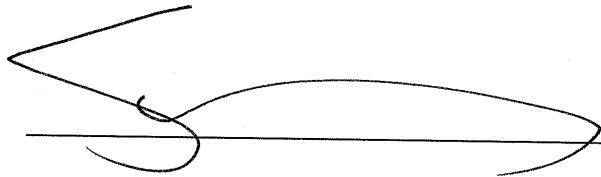
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A handwritten signature in black ink, consisting of a stylized, elongated loop with a horizontal line extending from the middle, ending in a small hook.